

## **Giuditta Cordero Moss (ed) : Common Law Contract Models and Commercial Transactions subject to Civilian Governing Laws**

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### **Circulation of Common Law Contract Models in Europe : the Impact of European Union System**

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#### *Summary*

Comparative law is no longer only concerned with comparing national laws. There is also an international dimension of the comparison and, as far as we are concerned, a European one.

The European framework modifies the comparative method. Comparing laws has become a triangular process: a contract model, which has been designed according to the rules of one particular national system is taken into account in another one, because a third one, the EU system, requires such a circulation.

The search for a proper implementation of EU law in each Member State fosters interactions between national laws.

#### *Table*

- 1. European Union System and Circulation of Common Law Contract Models**
- 2. An example: the "Courage" case**
- 3. The context of the case in European Union law**
- 4. The intervention of EU Law leads to a rereading of national models, which is rather nuanced and has a broad meaning**
- 5. Conclusion**